

**U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Kimberly A Williams

Debtor.

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Case No.: 18-15323

Chapter 13

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Kimberly A Williams, through her attorney George R. Tadross, has filed a Motion to Reinstate the Automatic Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before May 16, 2019 you or your attorney must do all of the following:

(a) File an answer explaining your position at:

Clerk's Office, US Bankruptcy Court
The Robert Nix Building
900 Market Street
Philadelphia, PA 1910

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the Movant's attorney:

Tadross Law
George R Tadross, Esquire

128 Chestnut Street, Suite 201
Philadelphia, Pa 19106

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Jean K. FitzSimon, United States Bankruptcy Judge, on May 29, 2019 at 9:30 am., in Courtroom #3, United States Bankruptcy Court, 900 Market Street, Philadelphia, Pa 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Date: May 2, 2019

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CERTIFICATION OF DEBTOR(S)

Kimberly A Williams, Debtor in the instant case, submit this Certification in support of the Motion to Reinstate the Automatic Stay as follows:

1. I am fully familiar with the facts set forth below.
2. I filed for bankruptcy on 8/10/18.
3. On January 7, 2019 the automatic stay was vacated because I fell behind in my regular mortgage payment.
4. I request that the stay be reinstated because I am caught up and paying my mortgage payment every month.
5. As of the date of this motion, payments to Wells Fargo are as follows:
 - 9/10/2018 \$2581.62
 - 11/4/2018 \$2581.62
 - 1/4/2019 \$7744.86
 - 3/7/2019 \$2600 (was returned by SLS)
 - April's payment not sent as they returned March's.

6. As of the date of this motion, payments to the Trustee are as follows:

10/9/2018 \$1,000.00

1/8/2019 \$4002.00

1/31/2019 \$2002.00

2/25/2019 \$1002.00

3/29/2019 \$2052.00

4/30/2019 \$2100 .00

7. The Chapter 13 plan was confirmed on March 27, 2019 with no objections.

I certify under penalty of perjury that the above is true.

Date: 5/2/2019

/s/Kimberly A Williams
Signature of the Debtor

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ORDER

And now, this _____ day of _____, 2019, upon the Motion of
Kimberly A. Williams (Movant) it is:

ORDERED that HSBC BANK USA, NATIONAL ASSOCIATION AS
TRUSTEE FOR NOMURA HOME EQUITY LOAN TRUST, SERIES 2006-WFI
ASSET BACKED PASS THROUGH CERTIFICATES (Respondents) shall immediately
accept the post-petition payments as the automatic stay has been reinstated

DATED:

UNITED STATES BANKRUPTCY JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:, Scott Waterman ECFMail@ReadingCh13.com and United States Trustee at USTPRegion03.HA.ECF@usdoj.gov.

DATED: May 2, 2019

/s/ George R Tadross

George R Tadross, Esquire
128 Chestnut Street, Suite 204
Philadelphia, PA 19106
215-500-5000 (phone)
267-885-2377 (fax)
Attorney for Debtor